

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO**

In re:

THE FINANCIAL OVERSIGHT AND
MANAGEMENT BOARD FOR PUERTO
RICO,

as representative of

THE COMMONWEALTH OF PUERTO
RICO *et al*,

Debtors¹

PROMESA
Title III

Case No. 17-bk-3283 (LTS)
(Jointly Administered)

**RESPONSE IN OPPOSITION TO THREE HUNDRED NINETY-FIRST OMNIBUS
OBJECTION (SUBSTANTIVE) OF THE COMMONWEALTH OR PUERTO RICO TO
CLAIM NO. 20926 [DOCKET ENTRY NO. 17974]**

COMES NOW the Claimant in Claim No. 17923, Compañía de Fomento Industrial de Puerto Rico, (“PRIDCO”, by its English acronym) represented by the undersigned attorney and very respectfully states and prays as follows:

1. The contact information of the legal representation of PRIDCO is as follows: PO Box 195075, San Juan, PR 00919-5075. Tel.: (787) 523-3434. Fax: (787) 523-3433. Email: lramos@plclawpr.com / lramos@cstlawpr.com.

2. The three hundred ninety-first Omnibus Objection of the Commonwealth of Puerto Rico (“Debtor”) asserts that PRIDCO's claim (Proof of Claim No. 20926) was partially paid and

¹ The Debtors in these Title III cases, along with each Debtor’s respective Title III case number and the last four (4) digits of each Debtor’s federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (the “Commonwealth”) (Bankruptcy Case No. 17-BK-3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation (“COFINA”) (Bankruptcy Case No. 17-BK-3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority (“HTA”) (Bankruptcy Case No. 17-BK-3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico (“ERS”) (Bankruptcy Case No. 17-BK-3566-LTS) (Last Four Digits of Federal Tax ID: 9686); (v) Puerto Rico Electric Power Authority (“PREPA”) (Bankruptcy Case No. 17- BK-4780-LTS) (Last Four Digits of Federal Tax ID: 3747); and (vi) Puerto Rico Public Buildings Authority (“PBA”) (Bankruptcy Case No. 19-BK-5233-LTS) (Last Four Digits of Federal Tax ID: 3801) (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

that invoices for the remaining amount were allegedly not received. See. Docket Entry (DE) No. 17974. Therefore, Debtor only partially recognized PRIDCO's claim and objected the rest.

3. Contrary to what Debtor stated to justify its partial objection, the evidence submitted with the proof of claim justifies the debt in its entirety. With the proof of claim, PRIDCO submitted a copy of its lease contract with the Department of Education, which establishes the payment obligations assumed by the latter. In addition, a list of all outstanding invoices was included. See, Exhibit 1. Subsequently, in response to a request for additional information, submitted through Prime Clerk, PRIDCO presented copies of the invoices submitted to the Department of Education. See, Exhibit 2.

4. Therefore, claimant of Proof of Claim No. 20926 opposes and contests any and all disallowance of its claim based on the alleged failure to submit invoices to Debtor.

WHEREFORE, the Claimant respectfully requests that this Honorable Court allow Claim No. 20926 as submitted and reject Debtor's partial objection thereto.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, this 18th day of October, 2021.

I HEREBY CERTIFY that on this same date this document was filed electronically with the Clerk of the Court using the CM/ECF system, which will send notification to all interested parties of record.

Counsel for Compañía de Fomento Industrial de Puerto Rico (PRIDCO, by its English acronym)

s/Luis R. Ramos Cartagena

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